

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA                  )  
    )  
Plaintiff,                                    )  
    )  
v.   ) Case No. 1:06-cr-0201-WHA-CSC  
    )  
OSCAR MARTINEZ-RAMIREZ,                )  
    )  
Defendant.                                    )

**MOTION FOR TRANSLATOR FEES**

COMES NOW, the defendant, Oscar Martinez-Ramirez, by and through counsel, and moves this Honorable Court to authorize the paid use of a translator to assist the defense attorney in his representation of the defendant.

In support thereof, the following is stated:

1. Defendant is a Mexican national.
2. Defendant's knowledge of English is extremely limited, far below that necessary for Defendant and his attorney to discuss defense matters in this case.
3. Defendant's court-appointed attorney speaks no Spanish.
4. The Court has a federally certified translator for all in-court matters.

Said translator lives in Andalusia, Alabama, making it impracticable for her to be present at short notice conferences and other meetings between Defendant and defense counsel occurring out of Court unless the

translator is already in Montgomery, Alabama.

WHEREFORE, Defendant respectfully moves this Honorable Court to authorize the expenditure of up to \$1,000.00 for payment for translation services in this case for discussions between Defendant and defense counsel, in out-of-court defense preparations and discussions.

Respectfully submitted this 20th day of February, 2007.

s/ Richard K. Keith  
**RICHARD K. KEITH (KEI003)**  
Attorney for Defendant  
**KEITH & DUBIN, P.C.**  
22 Scott Street  
Montgomery, AL 36104-4012  
Telephone: (334) 264-6776  
Facsimile: (334) 265-5362  
E-mail: rkk@rkeithlaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on February 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

A. Clark Morris, AUSA  
Post Office Box 197  
Montgomery, AL 36101-0197

s/ Richard K. Keith  
**OF COUNSEL**